

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Leila Green Little, *et al.*,

Plaintiffs,

v.

Llano County, *et al.*,

Defendants.

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Civil Action No. 1:22-cv-00424-RP

**PLAINTIFFS’ SUPPLEMENTAL BRIEF IN SUPPORT OF
ECF NOS. 114, 123, 124, AND 127 AND REQUEST FOR STATUS CONFERENCE**

Plaintiffs Leila Green Little, Jeanne Puryear, Diane Moster, Rebecca Jones, Richard Day, Cynthia Waring, and Kathy Kennedy (collectively, “Plaintiffs”), by and through their undersigned counsel, hereby submit this supplemental brief in support of the following motions:

- ECF No. 114, Plaintiffs’ Corrected¹ Opposed Motion to Compel Discovery Responses and for Sanctions,
- ECF No. 123, Plaintiffs’ Opposed Motion to Compel and for Sanctions,
- ECF No. 124, Plaintiffs’ Opposed Motion to Compel Production of Documents, and
- ECF No. 127, Plaintiffs’ Opposed Motion to Compel and for Sanctions.

For the Court’s ease of reference, the chart on the following pages of this Supplemental Brief identifies the broad categories of documents and deposition testimony that Defendants continue to withhold, which are subject to the above motions.

¹ The original version of Plaintiffs’ Opposed Motion to Compel Discovery Responses and for Sanctions is docketed as ECF No. 92.

Responsive Documents Improperly Withheld	
Description	Responsive To
Emails to and from llanoco.libraryadvisoryboard@gmail.com (Library Advisory Board)	<ul style="list-style-type: none"> • Plaintiffs' First Set of RFPs to Llano County, Jerry Don Moss, Amber Milum, and Bonnie Wallace Nos. 1-6; • Plaintiffs' Second Set of RFPs to Llano County Nos. 7-10, 14, 15, 17, 18, 19, 20, 25, 26; • Plaintiffs' Second Set of RFPs to Amber Milum No. 12; • Plaintiffs' First Set of RFPs to Bonnie Wallace Nos. 1-16; • Plaintiffs' First Set of RFPs to Rochelle Wells Nos. 1-10; • Plaintiffs' First Set of RFPs to Rhonda Schneider Nos. 1-10; • Plaintiffs' First Set of RFPs to Gay Baskin Nos. 1-10
Emails to and from Llano County Library and Librarian email addresses, including but not limited to the following: <ul style="list-style-type: none"> • nrenshaw.klib@yahoo.com, • sbaker.klib@yahoo.com, • suzette2699@yahoo.com, • llanocountylibrary@yahoo.com, • amilum.klib@yahoo.com, • llano_bookcomment@yahoo.com, • apuryear.klib@yahoo.com, • il.klib@yahoo.com, • lakeshore.library@gmail.com, • llano.circ@yahoo.com. 	<ul style="list-style-type: none"> • Plaintiffs' First Set of RFPs to Llano County, Jerry Don Moss, Amber Milum, and Bonnie Wallace Nos. 1-6; • Plaintiffs' Second Set of RFPs to Llano County Nos. 7-10, 14, 17, 18, 19, 20, 25, 26; • Plaintiffs' Omnibus RFPs to All Defendants Nos. 2, 3
Emails to and from LibertyForTheCaptives@hotmail.com (Rochelle Wells)	<ul style="list-style-type: none"> • Plaintiffs' First Set of RFPs to Rochelle Wells Nos. 1-10
Emails to and from bwpandc@gmail.com (Bonnie Wallace)	<ul style="list-style-type: none"> • Plaintiffs' First Set of RFPs to Bonnie Wallace Nos. 1-6; • Plaintiffs' Second Set of RFPs to Bonnie Wallace Nos. 7-16

Responsive Documents Improperly Withheld	
Description	Responsive To
Text messages and Emails with Jonathan F. Mitchell	<ul style="list-style-type: none"> Plaintiffs' Omnibus RFPs to All Defendants Nos. 2-3

Depositions			
Witness	Notice Served	Date of Deposition	Status
Bonnie Wallace	3/1/2023	3/22/2023	Defendant Wallace failed to appear.
Jerry Don Moss	3/1/2023	3/27/2023	Defendant Moss failed to appear.
Amber Milum	3/1/2023	3/30/2023	Defendants' counsel unilaterally refused to produce Defendant Milum.

Concurrently with this submission, Plaintiffs have filed a motion to extend the discovery deadline in light of the above pending motions, Defendants' consistent discovery violations, and the Court's March 29, 2023 order permitting Plaintiffs to take an additional nine depositions.

Additionally, to streamline these proceedings in a manner which will permit the parties to efficiently complete discovery and ensure a full factual record for trial, Plaintiffs request that the Court set a Status Conference at its earliest convenience to discuss these outstanding discovery and case management issues.

Dated: April 1, 2023

Respectfully submitted,

/s/ Ellen Leonida

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CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2023, a true and correct copy of the foregoing document was served on all counsel of record who have appeared in this case using the Court's CM/ECF system as a Filing User.

/s/ Ellen Leonida

Ellen V. Leonida